

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

BRIAN AND LINDA BROPHY

Case No.: 16-34595  
Judge: SLM  
Chapter: 13

**APPLICATION FOR EXTENSION OR  
EARLY TERMINATION OF LOSS MITIGATION PERIOD**

The undersigned is the attorney for the debtors in this matter. On December 23, 2019, a Loss Mitigation Order was entered concerning:

Property: 52 Bartholf Avenue, Pompton Lakes, NJ 07442

Creditor: Queens Park Oval Trust (Roundpoint Mortgage Services)

The Loss Mitigation Period will expire on May 27, 2020.

For the reason(s) set forth below, the debtors hereby requests:

☒ An extension of the Loss Mitigation Period to June 30, 2020.

☐ Early termination of the Loss Mitigation Period, effective \_\_\_\_\_.

Set forth the applicant's reason(s) for the above request:

The debtors were previously offered a trial loan modification agreement and made all trial payments. The servicer disputed that one of the trial payments was submitted on time. The debtors have been gathering documents to complete a new package, subject to their right to pursue the original trial offer. This process was delayed due to debtors having to quarantine and from office closures related to COVID-19. The debtors anticipate submitting the complete package within the next week and respectfully request an extension of loss mitigation in order to finish the process.

☐ The parties to this matter, listed on the *Certification of Service* filed with this Application, consent to immediate entry of the order granting this Application. A *Certification Concerning Order to Be Submitted* has been filed with the Court.

☐ The parties to this matter, listed on the *Certification of Service* filed with this Application, do not consent to immediate entry of the order granting this application. (If the non-consenting party fails to file an objection to this Application within 7 days of the filed date of the Application, which objection must be served on all Loss Mitigation parties, the Court may grant the relief requested.)

☒ Consent has not been requested.

Dated: May 28, 2020

/s/ David G. Beslow, Esq.  
Applicant's signature